

*Nevada Comments Docket ID number ETA-2017-0001 for Department of Labor -Employment and Training Administration*

*Joint PIRL 9170 – Joint PIRL*

Reporting Element: 100 – Unique Individual Identifier: How are states supposed to meet this requirement when title I & III are administered by a different agency than title II & IV. Each agency will have a different unique identifier as assigned by their MIS. Some clients receive services under multiple titles. Because there is the possibility of different identifiers participants will be counted more than once, rather than being counted once with multiple periods of participation.

Reporting Element: 808 - Migrant and Seasonal Farmworker Status at National Farmworker Jobs Program Entry (WIOA sec. 167): Does the value provided here affect reporting element 903 or 905? Can a 'youth' MSFW also be reported as an adult?

Reporting Element: 905 – Youth: Why is the youth no longer a participant, but only a reportable individual? If the client failed to complete the program requirements it doesn't mean funds were not spent. Wouldn't this be a participant with a negative outcome? Don't they still want to know what kind of service funding was used?

Reporting Element: 1608 - Employment Related to Training (2<sup>nd</sup> Quarter After Exit): How are states supposed to accurately report this? This would be a manual indicator as wage cross match will not be able to automatically set this flag. Obviously client's that stay in follow-up will be able to be reported; however, what about those that fall off the face of the Earth?

*Joint PIRL 9169 – WIOA Annual Statewide Performance Report - WIOA Adult, DW, Youth, WP, Voc Rehab & Adult Ed*

Reportable Individuals: How are unique “Reportable Individuals” who have multiple “Reportable Individual” episodes reported in the count and where are they counted, do they count one time or multiple?

Secondary & Post-Secondary education: If an individual is enrolled in both secondary and post-secondary education, which condition must they meet in order to qualify for the credential attainment rate numerator? For example, a Youth participant begins the period of participation in secondary education and achieves a secondary school diploma. The same participant becomes enrolled in post-secondary education later during the participant period. The post-secondary education period extends past the exit date but ends soon after the exit date without achievement of a recognized post-secondary credential. Does the participant need to receive a recognized post-secondary credential within 1 year after exit to qualify for the Credential Attainment Rate numerator? Does the achievement of the secondary school diploma and enrollment in education within one year after participation qualify for the Credential Attainment Rate numerator?

Reporting Element: 3 & 7 - Funds Expended/ Career Services: This may be difficult to obtain when fiscal management systems and program management systems are not the same. What is the source of the data for the report the PIRL has no cost elements?

Reporting Element: 4 & 8 - Funds Expended/Training Services: This may be difficult to obtain when fiscal management systems and program management systems are not the same. What is the source of the data for the report the PIRL has no cost elements?

### *Annual Statewide Performance Narrative*

Annual Narrative has an established 25 page limit attached. Do the 25 pages include or exclude the Statewide and Local Area Reports? If these reports are included, the limit is basically exceeded. Please clarify.

Annual Narrative will include the Employer Metrics, both the metric being piloted and any additional metric the State is using. It is not clear if a sentence detailing the measures and the rates are required or if the table listed under the Joint PIRL must be utilized.

### *ETP Performance Report Specs & 9171 WIOA Adult & DW Report*

The All Student data elements present a challenge, specifically elements: 113, 114, 115, 116, 118, 119, 120, 121, 122, 137 and 138. Are early implementation states finding that providers do not apply when faced with ETP reporting challenges? Does ETA have data regarding loss of provider due to implementation of ETP reporting requirements?

Reporting Element: 101 Type of Entity - The reportable values are: 1 = Higher Ed: Associate's Degree 2 = Higher Ed: Baccalaureate or Higher 3 = Higher Ed: Certificate of Completion 4 = National Apprenticeship 5 = Private Non-Profit 6 = Private For-Profit 7 = Public 8 = Other Type of Provider

For Data Element 101, Type of Entity, duplicative code values are provided which is confusing. Community colleges can be appropriately recorded as code value 1, as the majority of the credentials awarded are associates degrees. Community Colleges can also be appropriately recorded as code 3, as the majority of the credentials awarded are community college certificates of completion.

DATA ELEMENT NO.	DATA ELEMENT NAME	DATA TYPE / FIELD LENGTH	DATA ELEMENT DEFINITIONS / INSTRUCTIONS	CODE VALUE
100	Name of Eligible Training Provider	AN 75	Record the name of the organization deemed eligible by a state to provide training services to WIOA Adult and Dislocated Worker program participants.	XXXXXXXXXX
101	Type of Entity	IN 1	Record the type of training entity of the ETP as defined in 20 CFR 680.410.  Record 1 if the provider is an institution of higher education that only awards or the majority of credentials awarded are Associate's Degrees Record 2 if the provider is an institution of higher education that only awards or the majority of the credentials awarded are baccalaureate or higher degrees Record 3 if the provider is an institute of higher education where the majority of credentials awarded are a community college certificate of completion Record 4 if the provider is a National Apprenticeship provider Record 5 if the provider is a private non-profit provider Record 6 if the provider is a private for-profit provider Record 7 if the provider is a public provider Record 8 if the provider is a type of institution not listed above	1 = Higher Ed: Associate's Degree 2 = Higher Ed: Baccalaureate or Higher 3 = Higher Ed: Certificate of Completion 4 = National Apprenticeship 5 = Private Non-Profit 6 = Private For-Profit 7 = Public 8 = Other

Occupational training providers are not included among the list of data elements for example private vocational/career schools and two-year private/technical schools.

WIOA allows secondary schools as potential eligible training providers when their diplomas are offered in conjunction with Occ Skills training but this is not captured via the code values. It should be noted the Occupational Skills is the number one type of training for Adult & DW participants here in Nevada.

For example: If you review element #1303, 1310 & 1315 to and including the Code Value: Other Occupational Skills Training and NOTE: Code 06 (Other) should only be utilized in rare instances when other codes are clearly not appropriate.

1303	Type of Training Service #1	IN 2	Use the appropriate code to indicate the type of approved training being provided to the participant. NOTE: If OJT or Skill Upgrading is being provided as part of a Registered Apprenticeship program, choose Code 09. NOTE: Code 06 (Other) should only be utilized in rare instances when other codes are clearly not appropriate.  Record 00 if the participant did not receive a training service. Leave blank if this data element does not apply to the participant.	01 = On the Job Training 02 = Skill Upgrading 03 = Entrepreneurial Training (non-WIOA Youth) 04 = ABE or ESL (contextualized or other) in conjunction with Training (non-TAA funded) 05 = Customized Training 06 = Other Occupational Skills Training 07 = Remedial Training (ABE/ESL – TAA only) 08 = Prerequisite Training 09 = Registered Apprenticeship 10 = Youth Occupational Skills Training 11 = Other Non-Occupational-Skills Training 00 = No Training Service
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Reporting Element 103 – Program of Study – by potential outcome – multiple code values will be necessary as there may be outcomes. For example, a degree program may also have an outcome of an industry recognized (state/local) certificate. Again, here, “Occupational Skills Training” is noted to only be used in rare instances however, Occupational Skills here in Nevada is a popular type of training; this may cause an issue for Nevada.

Reporting Element 123 – Cost per WIOA Participation Served (reported by States) – This may be difficult to obtain when fiscal management systems and program management systems are not the same. What is the expected source of this data?

Reporting Element 128 – URL of Training Program – This will require maintenance at the program and provider level, updates will need to be done continuously and/or at least quarterly or biannually to ensure URL’s are correct and up-to-date, this is burdensome and will take significant time to ensure that the data is correct.

Reporting Element 131 – Program Length – What is the difference between clock and contact hours, what is the purpose?

Reporting Element 135 – Name of Associated Credential – The character limit of AN75 is of concern.

Reporting Element 136 – Reciprocal Agreements with Other States (to be completed by states) are all states with reciprocal agreements to be listed or only those in which the specific program is included in a reciprocal agreement? Need clarification; how will this be implemented?

Reporting Element 137 - All individuals Average Earnings (Q2) and #138 (Q4) – Why is this required for ETPL reporting? Q-4 median earnings is not a WIOA core measure.

Reporting Element 139 – O\*NET-SOC Code Associated with Program #1, 140 - O\*NET-SOC Code Associated with Program #2 and 141 - O\*NET-SOC Code Associated with Program #3 –Concern is that for existing programs on the ETPL, an SOC code is needed. This is a huge time burden to obtain and input the missing SOC codes, not previously required.

On page 8 of the Supporting Statement, it is stated that the States will submit their ETP data through DOL WIPS in a comma delimited file. Is WIPS prepared to take the file? WIPS has failed to produce all appropriate reports for both quarter 1 and quarter 2 reporting. If the system is not functioning in time, will states be held accountable for the information, while the system is being corrected?